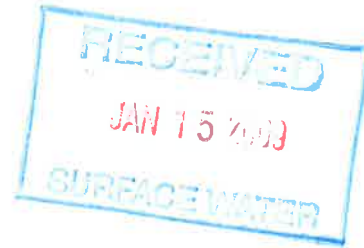




P.O. Box 625, Rt. 331S, Millsboro, DE 19966

January 12, 2009

Mr. Peder Hansen, P.E.
Program Manager
Pollution Control Branch
Division of Water Resources
DNREC
89 Kings Highway
Dover DE 19903



RE: Nutrient Offset Plan Report: Revised

Dear Mr. Hansen:

This letter serves as the sixteenth installment of the Pinnacle Foods Corporation's Nutrient Offset Plan Report. As required by Special Condition #7 of Pinnacle's NPDES Permit DE 0000736, "The permittee shall submit progress reports every six months outlining actions taken toward implementing this plan".

Spray irrigation operations began on May 5, 2009 and came to a close on October 15, 2009. Over 16 million gallons were sprayed on the Reed Canary/Orchard grass site. The field was cut three times in 2009, once each in May, August and November. The cuttings were baled in May and November for a total of 58 bales. The August cutting was in order to spray weed killer and was not baled.

The net pounds of nitrogen and phosphorus removed were 5349 lbs. nitrogen and 1715 lbs. phosphorous after fertilizer application.

Should you have any questions please call me at 302-934-3833.

Sincerely,

A handwritten signature in black ink that reads "Robert E. Lynch". The signature is written in a cursive, flowing style.

Robert E. Lynch
Environmental/Waste Water Supervisor

Randy Spence, PFG